

**MICHAEL T. SUCHER**  
ATTORNEY AT LAW

May 20, 2008

Hon. Naomi Reice Buchwald  
Judge, U.S. District Court  
500 Pearl Street  
New York, New York 10007

Re: SSP Capital Partners, LLC  
v. Mandala, LLC, et al.  
Case No.: 07 CV 3878 (NRB)

Dear Judge Buchwald:

Previously, the fact discovery cut-off date was set by Your Honor at May 7, 2008.

Additionally, we note that previously, counsel for Plaintiff complained that certain discovery was not yet then completed.

Please accept this letter as a response to Plaintiff's counsel letter, and as a request to enlarge the time allocated for discovery.

This is the first request for such enlargement.

Please note that depositions of all parties have been completed and we are at this time only awaiting a return from Plaintiff of the documents requested at his deposition.

The deposition of a non-party has been commenced but has not yet been completed, and should be completed within a short period of time.

Accordingly, counsel for Plaintiff and Defendant jointly request that the Court enlarge the time for completion of fact discovery in this case by extension through June 16, 2008..

Thank you for your consideration of the foregoing.

~~Very truly yours,~~

~~Michael T. Sucher~~

MTS:jk  
C.c. Richard Yeskoo, Esq.,  
Attorney for Plaintiff

4807  
5/23/08

\* A conference  
is scheduled for  
July 2, 2008 at  
3:00 p.m.